

E FILED ON 12/30/2020
THOMAS E. CROWE, ESQ.
THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION
2830 S. Jones Blvd., # 3
Las Vegas, Nevada 89146
(702) 794-0373
Attorney for Debtor's
Nevada State Bar no. 3048

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

* * * * *

In re:)	BANKRUPTCY NUMBER:
)	BK-S-20-10752-ABL
JIMENEZ ARMS, INC.)	
)	Chapter 7
)	
Debtor's.)	Date: February 3, 2021
)	Time: 9:30 a.m.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Comes now, THOMAS E. CROWE, ESQ., and moves this Honorable Court for an Order allowing him to withdraw as counsel of record for Jimenez Arms, Inc. in the above-entitled matter on the grounds set forth herein.

This Motion is based upon the pleadings and papers on file herein, the Affidavit of THOMAS E. CROWE, ESQ., attached hereto as Exhibit 1, and oral argument presented at the

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time of hearing of this matter.

DATED this 30th day of December, 2020

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

/s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd. #3
Las Vegas, NV 89146

Exhibit 1

AFFIDAVIT OF THOMAS E. CROWE

STATE OF NEVADA)

ss:

COUNTY OF CLARK)

THOMAS E. CROWE being first duly sworn, deposes and says:

1. That your Affiant is an attorney duly licensed to practice law in the State of Nevada and in such capacity.

2. That the Debtors have failed and refused to cooperate with Counsel as follows:

 X Other: Counsel represents Debtor in its Chapter 7 Bankruptcy. Debtors have indicated they do not wish to pay any further attorney's fees, creating a conflict of interest for counsel.

3. That Debtor does not wish to pay any further attorney fees.

4. That the last known address of Debtor is 7380 Eastgate Road, Suite 150, Henderson, NV 89011

FURTHER, your Affiant sayeth naught.

DATED this 30th day of December, 2020.

/s/THOMAS E. CROWE
THOMAS E. CROWE

SUBSCRIBED and SWORN to before me
this 30th day of December, 2020.

/s/JANE NOBLE
JANE NOBLE
NOTARY PUBLIC in and for said
County and State, Clark, Nevada

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E FILED ON
THOMAS E. CROWE, ESQ.
THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION
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2830 S. Jones Blvd. #3
Las Vegas, Nevada 89146
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Nevada State Bar no. 3048

**UNITED STATES BANKRUPTCY COURT
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In re:)	BANKRUPTCY NUMBER:
)	BK-S-20-10752-ABL
JIMENEZ ARMS, INC.)	
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)	
Debtor's.)	Date: February 3, 2021
)	Time: 9:30 a.m.

**PROPOSED ORDER GRANTING MOTION TO WITHDRAW AS
COUNSEL OF RECORD**

THIS MATTER having come on for hearing this 3rd day of February, 2021, by and through THOMAS E. CROWE, ESQ., and for good cause appearing, therefore

IT IS HEREBY ORDERED that the Motion to Withdraw as Counsel of Record is

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granted.

IT IS FURTHER ORDERED THAT the Debtors' last known address is

JIMENEZ ARMS, INC.
7380 EASTGATE ROAD, SUITE 150
HENDERSON, NV 89011

Respectfully Submitted by:

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

By /s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
State Bar No. 3048
2830 S. Jones Blvd. #3
Las Vegas, NV 89146

In Accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

 The Court has waived the requirement set forth in LR 9021(b)(1).

x No party appeared at the hearing or filed an objection to the motion.

 I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

 I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

/s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ

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